

Wroble, Julie

From: Wroble, Julie
Sent: Tuesday, March 01, 2016 11:36 AM
To: 'MACMILLAN Susan'
Subject: RE: Action Levels (3)

No problem. I'll sure we'll be in touch.

-----Original Message-----

From: MACMILLAN Susan [mailto:MacMillan.Susan@deq.state.or.us]
Sent: Tuesday, March 01, 2016 11:22 AM
To: Wroble, Julie <Wroble.Julie@epa.gov>
Subject: RE: Action Levels (3)

Hi, Julie --

The levels you saw yesterday in the original table were very draft and might be changed yet again, depending on how our agency review process goes at higher levels. Also, because we are in the midst of negotiations, our current table values are not mine to share. But your help was really valuable, and we made significant changes and added more information based on your input. Thanks very much for that help.

-----Original Message-----

From: Wroble, Julie [mailto:Wroble.Julie@epa.gov]
Sent: Tuesday, March 01, 2016 10:57 AM
To: MACMILLAN Susan
Subject: RE: Action Levels (3)

Can you send me your latest table? Thank you!

-----Original Message-----

From: MACMILLAN Susan [mailto:MacMillan.Susan@deq.state.or.us]
Sent: Tuesday, March 01, 2016 10:56 AM
To: Wroble, Julie <Wroble.Julie@epa.gov>
Cc: armitage.sarah@deq.state.or.us
Subject: RE: Action Levels (3)

Sorry, forgot to include that information. Yes, we are now not going to multiply any of our ABCs based on NC effects by any multiplier to calculate Action Levels. (The folks who originally put these numbers together had thought that all of the ABCs for metals were based on cancer, so now they know that some are based on NC effects.)

-----Original Message-----

From: Wroble, Julie [mailto:Wroble.Julie@epa.gov]
Sent: Tuesday, March 01, 2016 10:54 AM
To: MACMILLAN Susan
Subject: RE: Action Levels (3)

I am ok with you using your state values; however, I would caution you against using a multiplier of 20 for noncancer values for the reasons we discussed yesterday. Were you able to discuss that with Sarah?

-----Original Message-----

From: MACMILLAN Susan [mailto:MacMillan.Susan@deq.state.or.us]
Sent: Tuesday, March 01, 2016 10:46 AM

To: Wroble, Julie <Wroble.Julie@epa.gov>
Cc: armitage.sarah@deq.state.or.us
Subject: RE: Action Levels (3)

Hi, Julie ---

This morning I checked decisions made by our Air Toxics Science Advisory Committee (ATSAC, a panel of outside experts making science-based decisions only) in February and March in regard to cobalt and manganese. They are currently doing their 5-year review of existing ABCs, and chose to retain the original ABCs in all cases, with a slight change in the range of ABC values for nickel. They chose different criteria for both, as compared to what EPA uses, although they did consider the EPA values and then discussed why they chose not to use them. If you would like to know the particulars, I can send you that information.

-----Original Message-----

From: Wroble, Julie [mailto:Wroble.Julie@epa.gov]
Sent: Tuesday, March 01, 2016 10:27 AM
To: MACMILLAN Susan
Subject: RE: Action Levels (3)

I am pulling my values from the Regional Screening Levels tables. It's what regional risk assessors in the Superfund Program use. The equations are presented in the User's guide. My guess is the difference in your value and the RSL is that you've perhaps assumed 70 years exposure while the RSLs assume 26 years.

Julie

<http://www.epa.gov/risk/risk-based-screening-table-generic-tables>

-----Original Message-----

From: MACMILLAN Susan [mailto:MacMillan.Susan@deq.state.or.us]
Sent: Monday, February 29, 2016 5:25 PM
To: Wroble, Julie <Wroble.Julie@epa.gov>
Subject: RE: Action Levels (3)

Hi, Julie -- Am emailing from home right now. For cobalt's PPRTV, I thought I heard you say that it was 0.31 ng/kg.....but which value were you talking about? When I calculate a level protective to 10⁻⁶ using the PPRTV IUR of 9 per ug/m³, I get 0.11 ng/m³. Did I mis-hear you?

Also, what Mn value were you referring to?

From: Wroble, Julie [Wroble.Julie@epa.gov]
Sent: Monday, February 29, 2016 4:07 PM
To: MACMILLAN Susan
Subject: RE: Action Levels (3)

206-553-1079

From: MACMILLAN Susan [mailto:MacMillan.Susan@deq.state.or.us]
Sent: Monday, February 29, 2016 3:58 PM
To: armitage.sarah@deq.state.or.us; Wroble, Julie <Wroble.Julie@epa.gov>; McClintock, Katie <McClintock.Katie@epa.gov>
Cc: Narvaez, Madonna <Narvaez.Madonna@epa.gov>

Subject: RE: Action Levels (3)

It appears that all of the cancer-based DEQ Ambient Benchmark Concentrations in the attached table are protective of NC effects as well...with the possible exception of cadmium, by a very tiny margin. But look at my table and see what you think.

From: ARMITAGE Sarah
Sent: Monday, February 29, 2016 3:02 PM
To: 'Wroble, Julie'; McClintock, Katie; MACMILLAN Susan
Cc: Narvaez, Madonna
Subject: RE: Action Levels (3)

Julie,
I am working on a short turn around item related to our metals work so am asking Sue MacMillan to follow up with you and others from EPA.
Thanks for getting back to us, you will hear from Sue.
Sarah

From: Wroble, Julie [mailto:Wroble.Julie@epa.gov]
Sent: Monday, February 29, 2016 2:55 PM
To: McClintock, Katie
Cc: ARMITAGE Sarah; Narvaez, Madonna
Subject: RE: Action Levels (3)

Sarah:
I'm not sure I follow the basis for the action levels you provided. Is there an additional write up somewhere?

I would say that if the metals are carcinogens, you could potentially go as high as 100 times the value for initial screening as that would be equivalent to a 1E-04 cancer risk for chronic exposures. However, many of the metals also have noncancer values and you wouldn't want to exceed an HQ of 1 as that would increase the chance for adverse health effects. Once we get into more careful consideration of the data, we may want to consider the type and severity of adverse health effects.

Cr - 8 (1E-04 cancer risk)
Co - 6.3 (HQ = 1)
Cd - 10 (HQ = 1)
Mn - 52 (HQ = 1)
Ni - 15 (HQ = 1)
PB - ok at 150

This does get pretty tricky pretty quickly.
OAQPS may have a different read. I'm speaking for Region 10 at this point.
Julie

From: McClintock, Katie
Sent: Monday, February 29, 2016 1:00 PM
To: Wroble, Julie <Wroble.Julie@epa.gov><mailto:Wroble.Julie@epa.gov>>
Subject: FW: Action Levels (3)
Importance: High

From: ARMITAGE Sarah [mailto:ARMITAGE.Sarah@deq.state.or.us]
Sent: Monday, February 29, 2016 12:45 PM
To: McClintock, Katie <McClintock.Katie@epa.gov<mailto:McClintock.Katie@epa.gov>>
Subject: Action Levels (3)
Importance: High

Katie,

Thanks for sharing these with EPA folks for feedback on their level of protectiveness.

Two thoughts I had were comparing to the action levels used in the schools monitoring project (although there may be scientific updates since 2011) and the NATA benchmarks.

Appreciate your ongoing help.

Sarah